

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| IN RE: Jonatan E. Lopez-Martinez Stephanie J. Sitler Debtor(s) | CHAPTER 13 |
| Aurora Financial Group, Inc. Movant vs. | NO. 19-16785 ELF |
| Jonatan E. Lopez-Martinez Stephanie J. Sitler Debtor(s) | |
| Kenneth E. West Esq. Trustee | 11 U.S.C. Section 362 |

**MOTION OF Aurora Financial Group, Inc.
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362**

1. Movant is Aurora Financial Group, Inc.
2. Debtor(s) is/are the owner(s) of the premises 3152 Agate St, Philadelphia, PA 19134, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$184,300.00 on the mortgaged premises that was executed on August 17, 2018. The mortgage has been assigned as follows:

Mortgage Electronic Registration Systems, Inc., As Mortgagee, As Nominee for Primelending, A Plainscapital Company Its Successors and Assigns to Aurora Financial Group, Inc. recorded on January 2, 2020 in Philadelphia at Document Number 53613203.
4. Kenneth E. West Esq., is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$1,450.32 for the months of October 2021 through March 2022 and \$1,468.84 for the months of April 2022 through May 2022 plus late charges if applicable. The debtor's suspense balance is \$930.05.

7. The total amount necessary to reinstate the loan post-petition is \$10,709.55 (plus attorney's fees & costs).

8. Movant is entitled to relief from stay for cause.

9. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Rebecca A. Solarz, Esq.

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